



BellSouth Telecommunications, Inc.

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July 2, 2002

EXECUTIVE SECRETARY

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *Petition of Cinergy Communications Company for Arbitration of an Interconnection Agreement with BellSouth Telecommunications, Inc. pursuant to the Telecommunications Act of 1996*
Docket No. 01-00987

Petition of Tennessee UNE-P Coalition to Open a Contested Case Proceeding to Declare Switching an Unrestricted Unbundled Network Element
Docket No. 02-00207

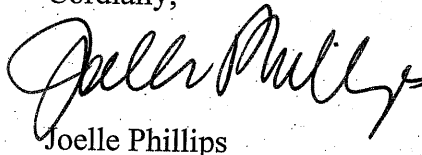
Generic Docket to Consider Technology Advances
Docket No. 02-00434

BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996
Docket No. 97-00309

Dear Ladies and Gentlemen:

We are sending the enclosed motion for the information of the Authority. We recognize that the Authority is not accepting filings during the week of July 1st through July 5th, and we intend to file the enclosed motion as soon as the Authority is able to take filings again. In the meantime, we simply wanted to make the Authority aware of the manner in which the parties were attempting to address the special circumstances arising out of the state government shutdown.

Cordially,



Joelle Phillips

JP/jej

Enclosure

cc: Henry Walker, Esquire

7/14/02

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In Re: *Petition of Cinergy Communications Company for Arbitration of an Interconnection Agreement with BellSouth Telecommunications, Inc. pursuant to the Telecommunications Act of 1996*
Docket No. 01-00987

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BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996
Docket No. 97-00309

**AGREED MOTION REGARDING FILING DEADLINES
DURING THE WEEK OF JULY 1ST THROUGH JULY 5TH, 2002**

The undersigned parties in the dockets described herein file this joint Agreed Motion to adjust filing deadlines in light of the government shutdown pending during the week of July 1st through July 5th. The parties have inquired and been informed that the Tennessee Regulatory Authority ("TRA") will not be accepting any filings during the week of July 1st through July 5th, in light of the shutdown of various government offices in Tennessee and the temporary furlough of Tennessee state employees. Because the parties are without any opportunities to file any items with the TRA, and because deadlines have been established in various dockets pending before the TRA during the week of July 1st through July 5th, the parties respectfully request that they be allowed to make those filings as follows:

1. **Cinergy Arbitration (01-00987).** In this docket, rebuttal testimony is currently set to be filed on July 2nd. The parties respectfully request that this date be continued until July 9th.

2. **UNE-P (02-00207)**. The parties received the order regarding motions to compel certain discovery responses on June 28th. Those responses were due to be filed on Friday, July 5th. The parties respectfully request that those responses instead be due on July 10th, and that the deadlines for direct testimony and rebuttal testimony also be continued such that direct testimony, due on July 12th would be due instead on July 19th. Rebuttal testimony which is due on July 26th would instead be due on August 2nd.

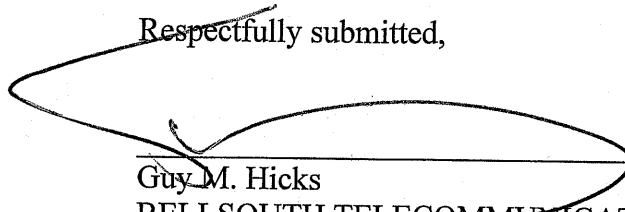
3. **Technology Advances Docket (02-00434)**. The parties respectfully request that the responses to the motion for reconsideration be filed on Friday, July 12th and supplemental comments be continued until July 19th.

4. **271 (97-00309)**. In this docket, there are no filings which have been formally set for the week of July 1st through July 5th; however, BellSouth intended to respond to a motion to compel during that time. In the event that BellSouth elects to supplement its discovery, either in lieu of responding to the motion to compel or in addition to responding to the motion to compel, BellSouth intends to serve such supplemental discovery on the parties during the week of July 1st through July 5th and file such supplemental discovery immediately after the TRA begins accepting filings again.

CONCLUSION

In light of the extraordinary circumstances arising from the Tennessee state government shutdown, the parties respectfully request that the foregoing presents a reasonable solution to the problems presented by the inability of the TRA to accept filings during the week of July 1st through July 5th. Moreover, the solution is the only practicable solution, which would not unfairly penalize the parties for the failure to meet filing deadlines under circumstances in which the agency is unable to accept filings.

Respectfully submitted,


Guy M. Hicks

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Henry Walker by J. Phillips
Henry Walker *with permission*

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Cinergy

Access Integrated Network, Inc.

Birch Telecom of the South, Inc.

Ernest Communications, Inc.

MCImetro Access Transmission Services, LLC,

MCI WorldCom Communications, Inc., and

Brooks Fiber Communications of Tennessee, Inc.

(collectively "WorldCom")

NewSouth Communications Corp.

Z-Tel Communications, Inc.

Association of Communications Enterprises

AT&T Communications of the South Central States

and TCG MidSouth, Inc. (collectively "AT&T")

DIECA Communications, Inc. d/b/a Covad

Communications Company

ITC^DeltaCom Communications, Inc.

Network Telephone Corporation

Southeastern Competitive Carriers Association